

FEATURE ARTICLE

“IT HAPPENS...”

There have been many articles in this publication which have stressed the benefits of common sense planning in spill prevention. One area of consideration is “Prediction of Flow.” [see 40 CFR 112.7(b)]. Your prediction should be blind to the obstacles (E.G., secondary containment) or procedures (E.G., daily inspections) that are in place which may stop or prevent the oil from reaching a navigable water way. We hear comments from facilities like, ‘Our tank is structurally sound, and if there was a problem we would see it during our daily inspections, but if the tank leaked out its entire contents, it could not get outside the secondary containment. So why should I waste my time imagining the possible ways oil can get out!’”

Well for a facility in Pennsylvania (I won’t mention their name) that had a ten (10) thousand gallon tank in a concrete vault located inside of a basement which was 200 yards from a stream, the impossible happened to them. Sure Rube Goldberg and Murphy’s Law were working overtime that cold winter day. But hey, the facility did not have a SPCC Plan, so why not pick on them.

So what went wrong to this new tank installation? Everything! It seems that the brand new level indicating system with a high level alarm was not working properly, so it was disconnected. Which would not be so bad since an employee measured the tank directly before calling the fuel oil company. Except the flimsy tape measure gave the employee a wrong reading, hence a request for more oil than the tank had space for. Which would not be so bad, except the fuel oil truck arrived to fill (or should I say overfill) the tank on a bitterly cold January day. The fuel oil truck driver set his pump meter gauge to the customer’s requested order and went inside to keep warm. This would not be so bad if when the tank overfilled (and it did by over a 1000 gallons) the nozzle’s overfill back pressure device was working

properly. This would not be so bad if the facility had a second set of eyes to oversee the ‘over-filling’ operation. When the tank’s overflow spilled out nobody noticed it. The overflow was located next to the fill connection, but was positioned above an outside stairwell which led down to the basement where the tank vault was located. The installing contractor did not notice the drain at the bottom of the stairwell, and the facility did not begin to consider the drain as a problem. Which would not be so bad except the drain ran inside the basement to a sump right next to the tank vault. Of course this sump had a little pump, which would not be so bad if the pump was turned off before ‘overfilling’ operation began. So of course the pump did it’s job and pumped the oil the rest of way to the stream over 200 yards away! Which would not have been so bad except nobody knew what the pump was doing, not until some resident a mile downstream called the fire Marshall about a bad odor.

It happens! It happened to them and if you give Goldberg and Murphy a chance, it will happen to you too. All we are asking at EPA is that you consider some of the possibilities of how a oil spill could happen, where it could end up, and then plan to prevent these possibilities. It could save you a lot in clean-up costs, not to mention *penalties*.

NEW FEATURE TO BE ADDED

NEW “SPILL CORNER”

Starting with the April edition of the *EPA III - Oil Program Activities* Newsletter we will be publishing select oil related articles and letters from industry and public sources. The articles or letters should be related to oil spill prevention or response, and should be less than 200 words in length. Typically, the articles could discuss lessons learned from a spill event, an improved prevention procedure/technology advancement, area drill events, accomplishments by mutual aid groups, etc. However, articles which emphasize the purchase of products or services will be discouraged. Send all articles to:

EPA Region III - Mailcode 3HW32
Oil Program Activities - Spill Corner
841 Chestnut Street
Philadelphia, PA 19107-4431

or via the Internet to
“SANCHEZ.ROBERT@EPAMAIL.EPA.GOV”. The deadline for articles is March 31, 1997.

RRC III QUARTERLY FIGURES

The Region III Response Center recorded and processed

approximately 377 oil spill notification reports during the first quarter of FY-97. Of the 377 reports, 6 spills resulted in accessing the Oil Spill Liability Trust Fund for cleanup and/or monitoring purposes.

PLANNING ACTIVITIES

MSO-HUNTINGTON REQUESTING INPUT ON HERO PLAN

USCG MSO-Huntington recently held a meeting on January 22, 1997 at MSO-Huntington to present and request input on the Huntington Environmental Response Operations (HERO) Plan. The MSO-Huntington Zone has been designated a sub-area by EPA Regions III and V and ranges from Ohio River Mile 121.6 to 374.8 and its tributaries. USCG is responsible for responding to spills and releases to navigable waterways related to marine transportation related incidents and EPA is responsible for responding to spills and releases in the inland area zone, including navigable waterways from onshore/fixed facilities. This inland area zone encompasses EPA Regions III, IV and V, the states of West Virginia, Ohio, and Kentucky, and three Department of Interior regions, as well as numerous local municipalities and industries. The HERO plan is written to address marine transportation related (MTR) incidents involving oil and chemical releases into the Ohio River and its tributaries. The HERO plan is intended to be a user friendly comprehensive response plan and should clearly describe and explain the response organization and the individual responder's role. The plan is built around the National Interagency Incident Command System (NIIMS) which employs a Unified Command Structure (UCS) approach in responding to spill or release incidents. The plan is divided into sections based upon the Command, Finance, Logistics, Operations, and Planning Sections used in NIIMS. Each section contains descriptions of each section's organization, relationship to other sections, and the scope and responsibilities of each job function within that section. Each plan section contains the tools, e.g., forms, contacts, reference materials, charts, databases, for each individual assigned to that section to carry out their individual job function. MSO-Huntington has spent the last 18 months putting together the HERO plan and is soliciting input from state, local government and industry within the Huntington Zone to ensure that the plan is truly comprehensive and usable. MSO-Huntington is currently copying the HERO plan printed and should have them available sometime in February '97. Copies of the HERO plan are also available on computer diskette. Please contact Lt. Shawn Moon, or Chief Shane Laws of MSO-Huntington at (304) 529-5524 for a copy of the HERO plan or for additional information.

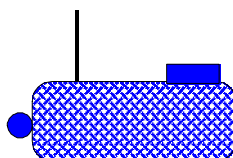
INLAND AREA PLAN UPDATE

EPA introduced the soon to be released CD ROM version of the Inland Area Contingency Plan and accompanying GIS mapping system for environmentally and economically sensitive areas at the January meeting of the RRT. The disks which were produced in a limited quantity will be made available to the state facilities regulated under the EPA-90 and the LEPCs or designated coordinators in Region III.

Distribution of this disk will promote a better understanding of the plans and familiarize the planners with some of the capabilities of the GIS system. It is hoped that this distribution will increase participation of local entities into this planning process. For further information, contact Steve Jarvela at (215) 566-3259, or via the Internet to "JARVELA.STEVE@EPAMAIL.EPA.GOV".

REGULATIONS

ACTION TAKEN



**EPA ISSUES
FIRST-IN-THE-NATION
UNDERGROUND
STORAGE TANK
PROGRAM COMPLAINTS
AGAINST U.S. NAVY FOR
UNDERGROUND
STORAGE TANK
VIOLATIONS AT TWO**

DISTRICT OF COLUMBIA FACILITIES

U.S. Environmental Protection Agency (EPA), has taken the first-ever UST program RCRA Section 9006 Complaints against the U.S. Navy for violations of federal underground storage tank regulations at Washington Navy Yard, and Anacostia Naval Station in Washington, D.C.

The U.S. Navy is the owner of many underground storage tanks at these facilities, which are used to store regulated substances, such as petroleum.

The Complaints against the Navy were brought under provisions of the Resource Conservation and Recovery Act (RCRA) addressing environmental problems from underground storage tanks (USTs). The law requires UST owners to notify state and local authorities, and implement measures to prevent, detect, and control releases from the underground tanks.

Karen Melvin, Chief, Removal Enforcement and Oil Section
841 Chestnut Building, Philadelphia, PA 19107
Ph...: (215) 566-3275

Paula Curtin, Editor, Enforcement Coordinator
303 Methodist Building, Wheeling, WV 26003
Ph...: (304) 234-0256

According to EPA's complaints, the U.S. Navy failed to comply with UST release detection, notification, and record keeping requirements for several underground tanks at the Washington Navy Yard and the Anacostia Naval Station. In accompanying compliance orders, EPA directs the Navy to correct the violations and submit a report to EPA which certifies whether or not the requirements have been met.

The Navy is entitled to a hearing to contest the alleged violations. The U.S. EPA coordinated with the District of Columbia Environmental Regulation Administration, and these actions are part of a continuing cooperative effort between the two agencies to enforce UST regulations."

PREVENTION METHODS

A GASOLINE DEPOT STILL BURNS 24 HOURS AFTER IT IS HIT BY LIGHTNING:

Woodbridge NJ On June 12th, 1996, Norman Leahy, chief of the Woodbridge Volunteer Fire Department, was driving home from his job as a telephone lineman and listening to the radio when heard a report about a gasoline tank fire in central New Jersey.

When the announcer said the fire was burning out of control in the Shell gasoline storage site in Woodbridge, Chief Leahy groaned and stepped on the accelerator. "I knew it was going to be a long night," he said.

In fact, the long night turned into more than 24 hours as over 250 firefighters from companies across New Jersey and New York City battled to contain the fire. The blaze, which sent plumes of heavy black smoke that could be seen for miles, was set off at 4:15PM Tuesday, when a bolt of lightning struck a tank containing three million gallons of gasoline and set off an explosion and fire.

Witnesses said the first explosion blew the top off, and one man said it bent the heavy steel roof "just like the lid off a can of tuna fish."

It is not possible to extinguish such a large gasoline fire with water, and firefighters were uncertain whether fire-retardant foam would work. So they decided to let as much gasoline as possible burn off, or be pumped off, before using foam. If the foam is used and does not work, they said, it slows down the fire, dragging out the time the fuel burns.

There was a touch of luck. As the fire burned, the tank collapsed inward, preventing the fuel from spilling. Late that morning, Chief Leahy said, enough fuel had burned to try the foam. And firefighters were concerned that if the flames had reached the

bottom of the tank, it would rupture and spill gas. At 12:02PM, firefighters began using water cannons to spray foam onto the flames.

The foam, which smothers a fire like a blanket and cuts off its oxygen, seemed to work at times, but the flames would soon reappear. By 6:30PM, firefighters were making their third attempt to use the foam, and officials said that even if it failed, the fire would burn out before midnight.

Officials said it was too soon to tell why heavy grounding cables failed to protect the gasoline tanks from lightning striking. A possible root cause could be that the grounding cables were painted over, corroded, bugs, dirt, etc. creating a path for lightning other than to ground. (Car battery cable connections - similar) When checking tanks put an ohmmeter (electrical resistance meter) from cable to tank and note the reading (should be very low). High reading - clean up the connections!.

EPA REGION III SPCC & FRP HOTLINE

Have a question on Spill Prevention, Control & Countermeasures (SPCC) 40 CFR S 112.1 or Facility Response Plans (FRP) 40 CFR S 112.20? EPA Region III has in place a hotline to answer these and other oil related questions. The hotline is staffed by the very people that will inspect your facility and review your spill plans. The hotline number is **(215) 566-3452**.

RECOVERY METHODS

DON'T LET THIS WINTER'S ICE GIVE YOU THE OIL RECOVERY BLUES

There are several important differences in the behavior of spilled oil in ice conditions which greatly reduces the effectiveness of response options. If the oil spills in water colder than the oil's pour point, the oil will quickly become viscous or tar-like. Lighter, refined products can lose the ability to emulsify and become non-coalescing, semi-solid, smooth, spherical particles which are difficult to recover. Weathering and loss by evaporation are slowed by low temperature, thickness of the slick, restriction of spreading, entrapment below the ices, and encapsulation in ice.

When spilled on ice, oil may pool in depressions and cavities, or be transported across the oil by wind. In ice with a porous crystal structure, oil can penetrate the ice; diesel-like oil can penetrate freely and deeply, whereas heavy oils remain more on the surface. If snow covers the ice, the increased absorption of solar radiation by the oil under the snow can result in daily melting and nightly re-freezing that can form an ice/oil/ice layer.

Oil spills trapped beneath the ice will collect in the rough underside areas of the ice sheet. Entrapped oil will spread until it reaches an equilibrium thickness. The oil can become encapsulated within the growing ice sheet, where it can remain until spring thaw. During breakup, decaying ice increases in porosity and decreases in strength. Oil spilled under or sandwiched between ice will rise through the ice and collect on the ice surface. For spilled oil under the ice, there are infrared and imaging techniques available to assist in locating oil pockets. Holes can be drilled in the ice at these collection points, and the oil removed by vacuum.

UPCOMING EVENTS

1997 INTERNATIONAL OIL SPILL CONFERENCE

The biennial International Oil Spill Conference is scheduled for April 7-10, 1997, in Fort Lauderdale, Florida. Over 2,000 oil spill professionals from around the world are expected to gather to hear 140 papers, view 80 poster displays, participate in panel sessions, and see demonstrations of new technologies. Of course the Conference is open to the public, but seats are limited so register early.

The conference has many sponsors. To name a few which include: associations like the American Petroleum Institute (API), the International Petroleum Industry, the International Maritime Organization (IMO); private industry like the Chevron Shipping Company, Shell Oil Company; and government agencies like the U.S. Coast Guard, & EPA. Since its inception 28 years ago, experts have gathered at the conference to discuss common problems and concerns and to share their knowledge with others in the field. The 1997 conference will address *Improving Environmental Protection - Progress, Challenges, Responsibilities*. Some of the 140 technical papers which will be discussed include topics about In-Situ Burning, Shoreline Cleanup in Norway-Lessons Learned, Leak Detection in Underground Pipelines, Oil Slick Classification, Shoreline Cleanup Equipment Review, Contingency Planning in New Zealand, etc, etc.

The conference will take place at the Greater Fort Lauderdale Broward County Convention Center. However, if you cannot make it you can order the 1997 Conference Proceedings Volume which includes the many technical papers presented at the conference. For more information on the conference call (202)639-4202 or access their web site at "www.api.org/ehs/gulf/gulf-oil.htm".

THE 9TH ANNUAL CEPP CONFERENCE

The U.S. EPA Region III, CEPP Conference "97" will be held at the Hilton Hotel, Pittsburgh, PA, December 2-5, 1997. The conference will be hosted by PA Emergency Management Agency (PEMA) and the Allegheny County LEPC with support from adjoining counties.

The first planning meeting will be held February 18, 1997 at the Allegheny County EMA Office.

For further information, contact Al Brown at (215) 566-3302.

REGION III RRT MEETING

The next regularly scheduled Region III RRT meeting will be held on May 13-15, 1997. The meeting will take place at Rehoboth Beach, Delaware.

For further information, contact Linda Marzulli at (215) 566-3256.

GENERAL INFORMATION

ARE YOU AN SPCC FACILITY?

- Does the facility store oil above or below ground?
- Does the facility store more than 1,320 gallons above ground?
- Does the facility store more than 660 gallons above ground in a single tank?
- Does the facility store more than 42,000 gallons below ground?
- Does the facility have a SPCC Plan?
- Is the SPCC Plan certified?
- Is the SPCC Plan signed by a registered professional engineer?

SPCC/FRP OUTREACH MANUAL

Have You Received Your Copy of EPA Region III's SPCC/FRP Outreach Manual?

If you would like to receive a copy please send or fax to:

Regina Starkey (3HW22)
SPCC Coordinator
U.S. EPA - Region III
841 Chestnut Building Philadelphia, PA 19107
Fax #: (215) 566-3138
Phone#:(215) 566-3292

MUTUAL-AID ACTIVITIES

OHIO-KANAWHA SPILL RESOURCE COUNCIL (OKSRC)

On December 11, 1996, and February 12, 1997, in Gallipolis, Ohio, OKSRC held its organizational meetings. The purpose of OKSRC is to form a mutual aid group that would be able to provide assistance and share equipment in the event of a major or catastrophic oil spill, OKSRC had requested EPA assistance in starting up a mutual aid group similar to the one that encompasses the Pittsburgh area. In attendance were approximately 30 representatives from various companies located along sections of the Ohio and Kanawha Rivers. Presentations were given by members of the Three River Pollution Response Council (TRPRC), by the Coast Guard and by the EPA. When the group is incorporated, its membership will participate in drills and workshops similar to those sponsored by the EPA and Coast Guard..

The Council is currently going through the incorporation process, writing the bi-laws, and will solicit membership during this next quarter. The Council is documenting a spill history, response resources, and performing a hazard analysis of their response area.

For further information, contact Gary "Jerry" Meadows at Shell Chemical Company (304) 576-4651.

OUTREACH

EPA ASSISTANCE OFFERED FOR HICKEY RUN OIL POLLUTION CLEANUP

Hickey Run is the most degraded sub-watershed in the Anacostia basin due to significant waste oil dumping and unmanaged storm water flows. It flows roughly one mile through the U.S. National Arboretum and is highly visible in the Anacostia community. This week, the Chesapeake Bay Program Office, in conjunction with EPA's Federal Facility Coordination convened a strategy session with Congressional Representative David Shepp to review what was know of the pollution sources and what had been done to date.

It was reported that prior EPA enforcement actions involving Washington Metro, Amtrak and GreyHound facilities had succeeded in stemming some of the large spills into the river. Now over 40 smaller commercial establishments have been

targeted as on-going sources. A multi faceted strategy for EPA assisting on Hickey Run included 308 letters, compliance assistance workshops and further inspection/enforcement work.

Addendum:

The SPCC Program has been concerned with Hickey Run because of the oil pollution problems and have attempted to bring facilities in the area into compliance.

AWARDS

PUBLIC SERVICE COMMENDATION AWARD

On February 11,1997, Mr. James Kastner, of LTV Steel received a Public Service Award for his outstanding contributions to the Coast Guard and community while serving as President of the Three Rivers Pollution Response Council(TRPRC).

The award was presented by MSO Pittsburgh Commander E.J. Fink. Mr. Kastner served as President of the TRPRC from October 1995 to December 1996. Mr. Kastner's firm leadership during both emergencies and daily operations dramatically influenced waterway safety within the Three Rivers region. His emphasis on partnerships, training, and emergency response were vital to MSO Pittsburgh's Prevention Through People Initiative. His sponsorship of partnerships

Region III Oil Program Contacts:

Karen Melvin -Chief, Removal Enforcement and Oil Section	(215) 566-3275
Cordy Stephens -Secretary	(215) 566-3276
Steve Jarvela -On-Scene Coordinator -Inland Area Committee, Chair	(215) 566-3259
Linda Ziegler -Oil Program Coordinator -Facility Response Plan (FRP) Coordinator -Oil Pollution Act -RRT, Area Committees, Port Area Committee -Spill Response Countermeasure (Dispersants) -Outreach	(215) 566-3277
Jean Starkey -SPCC Coordinator -OPA Spill Penalty Program -SPCC Enforcement -Multi-Media Enforcement -Outreach	(215) 566-3292
Paula Curtin -Oil Enforcement Coordinator -OPA Spill Penalty Program -Spill Investigations -Oil Program Activities Newsletter -Outreach	(304) 234-0256
Mike Welsh -SPCC/FRP Inspector & Plan Reviews -Outreach	(215) 566-3285
Rob Sanchez -SPCC/FRP Inspector & Plan Reviews -Outreach	(215) 566-3451
Bernie Stepanski -Spill Investigations	(215) 566-3288
Frank Cosgrove -SPCC/FRP Inspections and Plan Review -SPCC Enforcement Support -Outreach	(215) 566-3284

with the Coast Guard, Army Corps of Engineers, Port of Pittsburgh Commission, Three Rivers Pollution Response Council, Pittsburgh Safe Boating Committee, and River Terminal Operator's Association was the key to establishing an integrated system of marine waterway users. This system prevented conflicts and allowed all waterway users to safely accommodate multiple interests and gather and share information during two major floods in 1996. The council provided invaluable training, the "Abbotsville" scenario, multiple spill response seminars, and a 3-day Area Exercise in June 1996. Mister Kastner's contribution to Commander, Coast Guard Forces response during the January Flood of 1996 and the first summer flood in decades was invaluable in protecting the region's waterways from pollution and reestablishing safe navigation. Mr. Kastner's leadership and expertise are most heartily commended and are in keeping with the highest traditions of public service.

EPA would like to take this opportunity to offer Mr. Kastner congratulations on receiving this prestigious award.

OTHER CONTACT NUMBERS

WVDEP CONSOLIDATES SPILL LINES

The WV Division of Environmental Protection has consolidated its emergency spill telephone numbers to improve response times and reduce confusion.

The spill response telephone number for mining, oil and gas, waste, water and air emergencies is: **1-800-642-3074**. This number is for emergency use and not for complaints.

OTHER REGIONAL TELEPHONE NUMBERS

If you'd like to submit an article, comments, suggestions, etc., or receive your copy of this newsletter, please contact: Paula Curtin at (304) 234-0256, or you may send the information via Internet to:

CURTIN.PAULA @ EPAMAIL.EPA.GOV

Regional Office Main Line - (215) 566-5000
TDD (Hearing Impaired) - (215) 580-2024
Regional Office Library - (215) 566-5254
Hazardous Waste Library - (215) 566-5363
Superfund Community Involvement Hotline
(800) 553-2509

Toll-Free Citizen's Hotline (800) 438-2474
Public Environ. Education Ctr(800) 438-2474
Business Assistance Center (800) 228-8711